

1 SHOOK, HARDY & BACON LLP
2 B. Trent Webb, Esq. (*pro hac vice*)
Peter Strand Esq. (*pro hac vice*)
3 Ryan D. Dykal Esq. (*pro hac vice*)
2555 Grand Boulevard
4 Kansas City, Missouri 64108-2613
Telephone: (816) 474-6550
5 Facsimile: (816) 421-5547
bwebb@shb.com

7 Robert H. Reckers, Esq. (*pro hac vice*)
600 Travis Street, Suite 1600
8 Houston, Texas 77002
Telephone: (713) 227-8008
9 Facsimile: (731) 227-9508
rreckers@shb.com

GREENBERG TRAURIG
Mark G. Tratos, Esq. (Nevada Bar No. 1086)
Brandon Roos, Esq. (Nevada Bar No. 7888)
Leslie Godfrey, Esq. (Nevada Bar No. 10229)
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, NV 89169
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
tratosm@gtlaw.com
roosb@gtlaw.com
godfreyl@gtlaw.com

LEWIS AND ROCA LLP
W. West Allen (Nevada Bar No. 5566)
3993 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
Tel: (702) 949-8200
Fax: (702) 949-8398
WAllen@LRRLaw.com

13 *Attorneys for Defendants*
14 *Rimini Street, Inc., and Seth Ravin*

15
16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA

18 ORACLE USA, INC., a Colorado corporation;
19 ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
20 CORPORATION, a California corporation,

21 Plaintiffs,

22 v.

23 RIMINI STREET, INC. , a Nevada corporation;
24 SETH RAVIN, an individual,

25 Defendants.

Case No. 2:10-cv-0106-LRH-PAL

26
**DECLARATION OF ROBERT H.
RECKERS IN SUPPORT OF
DEFENDANTS' MOTION TO
EXCLUDE EXPERT TESTIMONY OF
ELIZABETH A. DEAN**

27
Date:
Time:
Place:
Judge: Hon. Larry R. Hicks

28 DECLARATION OF ROBERT H. RECKERS IN SUPPORT OF MOTION TO EXCLUDE EXPERT TESTIMONY OF
ELIZABETH A. DEAN

1 **DECLARATION OF ROBERT H. RECKERS**

2 I, Robert H. Reckers, have personal knowledge of the facts stated below and, under
3 penalty of perjury, hereby declare:

4 1. I am an attorney admitted to practice *pro hac vice* before this Court in the
5 above captioned matter, and an attorney at Shook, Hardy, and Bacon LLP, attorneys for Defendants
6 Rimini Street, Inc. and Seth Ravin, (“Defendant”). I make this declaration in support of Defendants’
7 Motion to Exclude Expert Testimony of Elizabeth A. Dean, on May, 20, 2015. The Exhibits
8 referenced below are all attached to this Declaration.

9 2. Attached to this Declaration as **Exhibit A** is a true and accurate copy of
10 selected excerpts of the Expert Report of Elizabeth A. Dean, served in the above captioned case on
11 January 17, 2012.

12 3. Attached to this Declaration as **Exhibit B** is a true and accurate copy of
13 selected excerpts of the Deposition of Elizabeth A. Dean, taken in the above captioned case on May
14 23, 2012.

15 4. Attached to this Declaration as **Exhibit C** is a true and accurate copy of
16 selected excerpts of the Expert Report of Scott D. Hampton, served in the above captioned case on
17 March 30, 2012.

18 5. Attached to this Declaration as **Exhibit D** is a true and accurate copy of
19 selected excerpts of Plaintiff Oracle’s Responses to Rimini’s First Interrogatories, Nos. 1–12, served
20 in the above captioned cased on December 19, 2012.

21 6. Attached to this Declaration as **Exhibit E** is a true and accurate copy of
22 selected excerpts from the 30(b)(6) deposition of Stephen Woodward, taken in the above captioned
23 case on November 17, 2011.

24 7. Attached to this Declaration as **Exhibit F** is a true and accurate copy of
25 selected excerpts of the deposition of Brian Baggett, taken in the above captioned case on November
26 10, 2011.

8. Attached to this Declaration as **Exhibit G** is a true and accurate copy of selected excerpts of the deposition of Richard Cummins, taken in the above captioned case on July 13, 2011 and Exhibit 2 thereto.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on May 20,2015

/s/ Robert H. Reckers
Robert H. Reckers, Esq.